

EXHIBIT 2

REDACTED

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: "Louis F. Teran" <lteran@slclg.com>
Date: July 3, 2024 at 5:41:54 PM EDT
To: "Cupar, David B." <dcupar@mcdonaldhopkins.com>
Subject: [External] RE: Spectrum v. URZ

Mr. Cupar,

I am in receipt of your email below. Pursuant to your email and the Court's Order, URZ is ready and prepared to provide its ESI sources and devices for imaging and to make its facility available for physical inspection on July 8, 2024 at 6pm (Houston time). As we previously discussed, URZ's facility closes for business at 6pm. Therefore, URZ will make its facility and ESI resources available to you and your ESI vendor on July 8, 2024 at 6pm.

In addition, pursuant to your email, below is the information you requested in your letter dated May 9, 2024. Please note that all this information is HIGHLY CONFIDENTIAL. I have removed all other recipients from this email so as to protect confidentiality by emailing this information only to you. I leave it to you to properly protect the confidentiality of this information and to share this information with others that absolutely need it. Pursuant to the Protective Order, please provide me with the Exhibit A signed by anyone with whom you share this information.

Section A(1) - web access email accounts:

REDACTED @GMAIL.COM - Email provider: Google - Owned and used by URZ Trendz, LLC. - Password: to be provided on July 8, 2024 for imaging.

REDACTED @GMAIL.COM - Email provider: Google - Owned and used by URZ Trendz, LLC. - Password: to be provided on July 8, 2024 for imaging.

Section A(2) - non-web access email accounts: NONE

Section A(3) - all the listed devices will be made available for imaging on July 8, 2024 at URZ's facility (address listed below):

Computer #1: REDACTED

Computer/Server #2: REDACTED

Section A(4) - The software used by URZ is: REDACTED

Section B(1):

Bank name: REDACTED

Bank account number: REDACTED

Section B(2):

All purchase and sales records that have been located by URZ after a diligent search have already been produced (DEFENDANT-0001 to DEFENDANT-0053).

Section B(3):

URZ only has one location from which it conducts all its business:

REDACTED

Let me know if you need any more information.

Thank you

Louis F. Teran

Attorney at Law

SLC Law Group

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Pasadena, CA 91106

Phone: (818) 484-3217 x200

Fax: (866) 665-8877

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If you have received this communication in error, please notify us immediately by return e-mail or by calling us at (800) 752-8470. We will arrange the retrieval of the original documents at no cost to you. Thank you.

-----Original Message-----

From: Cupar, David B. <dcupar@mcdonaldhopkins.com>

Sent: Tuesday, July 2, 2024 6:43 PM

To: Louis F. Teran <lteran@slclg.com>
Cc: 'Courtney Ervin' <cervin@hicks-thomas.com>; Cavanagh, Matthew J.
<mcavanagh@mcdonaldhopkins.com>; 'Ryan Cordell' <rcordell@hicks-thomas.com>
Subject: Re: Spectrum v. URZ

Louis,

URZ's proposed process is inconsistent with standard forensic ESI discovery procedures and unworkable. We therefore cannot agree with your proposed process. URZ's failure to respond to Spectrum's May 9 letter and provide the necessary information before the inspection is unjustified. Vacation plans that you have starting in a few weeks do not excuse non-compliance with the Court's order before heading out on vacation.

The Court ordered URZ to provide the information requested in our May 9 letter by June 24. URZ has refused to comply and remains in violation until it provides the requested information. Your disagreement with this requirement is irrelevant; it is pursuant to a Court Order.

Your email today does not help Spectrum or URZ on a proper ESI collection process. The information sought in our May 9 letter is essential for the ESI collection. Delivering devices without this information is insufficient. For instance, our vendor needs passwords and system details to professionally and efficiently extract the data. Collection takes longer than the one hour you assume, especially without prior information about the devices. Proper planning benefits both parties.

We have made multiple attempts to facilitate the efficient collection of this information, including letters, court relief, and offers to connect our vendor with your client. Your refusal to comply with the Court's orders is prejudicing Spectrum and its ESI vendor, who has had to forgo other matters to be available for your proposed dates. Your continued non-compliance also jeopardizes your vacation plans.

Spectrum demands by July 3 that you:

1. Provide the information in our May 9 letter so that Spectrum then can conduct the ESI collection and site visit by July 8
2. Provide the information regarding the collection of email accounts by July 3.

If URZ refuses, Spectrum will seek emergency relief from the Court, including sanctions and recovery of costs incurred due to URZ's non-compliance.

Regards,

Dave

From: Louis F. Teran <lteran@slclg.com>
Sent: Tuesday, July 2, 2024 5:08:40 PM
To: Cupar, David B.
Cc: 'Courtney Ervin'; Cavanagh, Matthew J.; 'Ryan Cordell'

Subject: [External] RE: Spectrum v. URZ

I am in receipt of your email from yesterday and today. Your implication that I am not responding to emails is not well taken. I have a full schedule. I was in mediation all day yesterday that poured over into this morning. Besides, your email was received yesterday, there is no delay.

Nevertheless, I need clarification because your prior email indicates that before anything gets done, you want the information requested in your May 9 letter. Then, as I indicated in my response, I disagreed with your approach but agreed to collect such information for you in good faith. As I indicated in my email, we would likely have the information by the end of this week. In fact, I already instructed my client to gather said information. You can refer to my email dated June 28.

Now, in your email from yesterday, it seems that you want to discuss the May 9 letter in a conference call. I am not sure why this is necessary.

Besides this is premature as we are still collecting the information you requested in said letter. It is my view that this process will take too much time unnecessarily. I wish to avoid any undue delays on this. We wish to get this process completed as soon as possible so we can proceed with the MSJ and trial in this case.

Therefore, rather than spending too much time with the letter and in light of the upcoming vacation schedules, I suggest the following: As I indicated in my previous emails, URZ is ready and willing to make its ESI devices and information available for imaging pursuant to the Court's order on July 3, July 5, or July 8. This would ensure that the imaging takes place promptly before the upcoming vacations. In addition, in my prior email, I indicated that URZ has 3 cell phones, 2 computers, and 1 server to make available for imaging. Therefore, I suggest that you provide me with the address of your ESI vendor (presumably a Houston address), then we will deliver the devices by courier to your ESI vendor on July 3, July 5, or July 8 for immediate imaging. I presume that the imaging will not be longer than 1 hour. So our courier will wait for the imaging to be completed and then return the devices back to URZ. I think this process will ensure that you have completed your imaging and all evidence is preserved promptly and before the upcoming vacation schedules.

Let me know if you agree with this process or if you wish to proceed a different way.

Thank you

Louis F. Teran
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Pasadena, CA 91106
Phone: (818) 484-3217 x200
Fax: (866) 665-8877

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From: Cupar, David B. <dcupar@mcdonaldhopkins.com>
Sent: Tuesday, July 2, 2024 5:28 AM
To: 'Louis F. Teran' <lteran@slclg.com>
Cc: 'Courtney Ervin' <cervin@hicks-thomas.com>; Cavanagh, Matthew J. <mcavanagh@mcdonaldhopkins.com>; 'Ryan Cordell' <rcordell@hicks-thomas.com>; 'Aaron Hughes' <aaron.hughes@vidocrazor.com>
Subject: RE: Spectrum v. URZ

Dave
David B. Cupar
Member

dcupar@mcdonaldhopkins.com<mailto:dcupar@mcdonaldhopkins.com>
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From: Cupar, David B.
Sent: Monday, July 1, 2024 11:57 AM
To: 'Louis F. Teran' <lteran@slclg.com<mailto:lteran@slclg.com>>
Cc: 'Courtney Ervin' <cervin@hicks-thomas.com<mailto:cervin@hicks-thomas.com>>; Cavanagh, Matthew J. <mcavanagh@mcdonaldhopkins.com<mailto:mcavanagh@mcdonaldhopkins.com>>; 'Ryan Cordell' <rcordell@hicks-thomas.com<mailto:rcordell@hicks-thomas.com>>; Aaron Hughes <aaron.hughes@vidocrazor.com<mailto:aaron.hughes@vidocrazor.com>>
Subject: RE: [External] RE: Spectrum v. URZ

Louis,

I copy our ESI vendor Aaron Hughes on this email to minimize business interruption and to make this as efficient as possible. To make this work for the July 3, 5, and 8 dates you propose, let me know if you and the right person(s) from URZ are available for a call at 3p CT this afternoon with us to go over our May 9 letter (attached) so we can work with you to have all of this completed.

As a reminder to you, the Court granted Spectrum's motion to preserve the ESI on June 21, and the Court ordered URZ to respond to the attached letter within three days, i.e., June 24, which URZ has not done.

We appreciate the fact that you and your client will be heading on vacations for more than a month each soon, but we expect you and your client will fully cooperate with us to make sure URZ fully complies with the Court's preservation and discovery orders before you head out on vacation.

Best,
Dave

David B. Cupar
Member

T: 216.430.2036

F: 216.348.5474

dcupar@mcdonaldhopkins.com<mailto:dcupar@mcdonaldhopkins.com>

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From: Louis F. Teran <lteran@slclg.com<mailto:lteran@slclg.com>>

Sent: Friday, June 28, 2024 7:44 PM

To: Cupar, David B.

<dcupar@mcdonaldhopkins.com<mailto:dcupar@mcdonaldhopkins.com>>

Cc: 'Courtney Ervin'

<cervin@hicks-thomas.com<mailto:cervin@hicks-thomas.com>>; Cavanagh, Matthew J.

<mcavanagh@mcdonaldhopkins.com<mailto:mcavanagh@mcdonaldhopkins.com>>;

'Ryan Cordell' <rcordell@hicks-thomas.com<mailto:rcordell@hicks-thomas.com>>

Subject: [External] RE: Spectrum v. URZ

I am in receipt of your email below. I disagree that “the first step in complying with the Court’s order” is responding to your letter. The order expressly requires URZ to make its ESI information and devices available for imaging by your ESI vendor and to make its facilities available for physical inspection. There is nothing in the Order requiring URZ to respond to your letter.

Nevertheless, in an effort to cooperate in good faith, I have reviewed your letter and, per your request, we will gather as much of the information you request as we can. However, as I indicated in my email below, URZ is making its facilities available for physical inspection and its ESI devices for imaging by your ESI vendor on July 3, July 5, or July 8. I suggest that we schedule one of those dates so that we can complete this process and move on with the rest of the case including the MSJ and trial.

If Spectrum is unable to accommodate one of the dates proposed, then we are willing to reschedule to a more suitable date. However, it is important to note, per my email below, that I am scheduled to be out of the country and on vacation from July 12 to August 15. In addition, URZ's main representative is scheduled to be out of the country and on vacation from July 10 to August 4. Thus, any rescheduling will have to be for the second half of August or September. Please confirm that this is acceptable.

We should have the information requested in your letter by the end of next week. Feel free to contact me with any comments or questions.

Thank you

Louis F. Teran
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by calling us at (800) 752-8470. We will arrange the retrieval of the original documents at no cost to you. Thank you.

From: Cupar, David B.

<dcupar@mcdonaldhopkins.com<mailto:dcupar@mcdonaldhopkins.com>>

Sent: Wednesday, June 26, 2024 12:03 PM

To: 'Louis F. Teran' <lteran@slclg.com<mailto:lteran@slclg.com>>

Cc: Courtney Ervin

<cervin@hicks-thomas.com<mailto:cervin@hicks-thomas.com>>; Cavanagh, Matthew J.

<mcavanagh@mcdonaldhopkins.com<mailto:mcavanagh@mcdonaldhopkins.com>>;

'Ryan Cordell' <rcordell@hicks-thomas.com<mailto:rcordell@hicks-thomas.com>>

Subject: RE: Spectrum v. URZ

Mr. Teran,

As the first step in complying with the district court's Order, URZ must provide all of the information requested in my May 9, 2024 letter (attached). Please provide the requested information by no later than this Friday, June 28, to comply with the Order and allow us begin the discovery work.

Also, please keep Courtney, Matt, and Ryan on all emails so that we can respond to you as timely as possible.

Regards,

Dave

David B. Cupar
Member

T: 216.430.2036

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From: Louis F. Teran <lteran@slclg.com<mailto:lteran@slclg.com>>
Sent: Tuesday, June 25, 2024 1:51 PM
To: Cupar, David B.
<dcupar@mcdonaldhopkins.com<mailto:dcupar@mcdonaldhopkins.com>>
Subject: [External] Spectrum v. URZ

Mr. Cupar,

Pursuant to the Fifth Circuit's Order denying URZ's Petition for Writ of Mandamus, URZ is ready to proceed with the District Court's discovery order as soon as possible so we can get this out of the way and proceed expeditiously with the other aspects of the case, including trial. Please note that I will be out of the country on vacation from July 12 to August 15. In addition, the main representative of URZ will be out of the country on vacation from July 10 to August 4. Therefore, we would like to complete as much of the discovery order as possible, if not all of it, between now and July 9.

For that reason, we would like to proceed as follows: (1) URZ is preparing its bank account information; (2) URZ is available for the physical inspection to take place after business hours on July 3, July 5, or July 8. Let me know which of the proposed dates works best for you; and (3) let me know how to coordinate your ESI vendor to get the data it requires.

Preliminarily, we have 2 computers, 1 server, and 3 cell phones at issue.

I look forward to your prompt response.

Thank you

Louis F. Teran
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